



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JOHN J. KIM, INTERIM DIRECTOR

217-524-1655

September 27, 2012

US EPA RECORDS CENTER REGION 5



441169

Ms. Joan M. Tanaka
United States Environmental Protection Agency
Superfund Division
77 West Jackson Boulevard
Mail Code S-6J
Chicago, Illinois 60604-3590

Re: 1358070001-Montgomery County
Eagle Zinc-Hillsboro, Illinois
Superfund/Technical Reports

Dear Ms. Tanaka:

The purpose of this letter is to transmit the formal concurrence of the Illinois Environmental Protection Agency on the Record of Decision for the Eagle Zinc Superfund Site, Operable Unit 2 in Hillsboro, Illinois.

If you should have any questions, need any additional information, or require any assistance regarding this matter, please contact me at 217-524-1655 or via electronic mail at: clarence.smith@illinois.gov.

Respectfully,

Clarence L. Smith, Manager
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

Attachment

DECLARATION FOR THE RECORD OF DECISION

Selected Remedy for the
Eagle Zinc National Priorities List Site – Operable Unit 2
Hillsboro, Montgomery County, Illinois

SITE NAME AND LOCATION

1358070001 – Montgomery County
Eagle Zinc National Priorities List Site – Operable Unit 2
CERCLIS Identification Number ILD 980 606 941
Hillsboro, Montgomery County, Illinois

STATEMENT OF BASIS AND PURPOSE

This decision document represents the selected remedial actions for the Eagle Zinc National Priorities List (NPL) site, Operable Unit 2 (OU2), Hillsboro, Illinois, (CERCLIS identification number ILD 980 606 941). The United States Environmental Protection Agency (USEPA), in consultation with the Illinois Environmental Protection Agency (Illinois EPA), selected the remedy in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA or Superfund) and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP, 40 Code of Federal Regulations (CFR) 300 – 399). Our decisions are based on the Administrative Record for the Eagle Zinc NPL site.

This declaration indicates the State of Illinois' concurrence with the selection of remedial alternative 3 –Immobilization, IAC 807 Compliant Soil Cover, Stream Re-alignment, Institutional Controls, and Monitoring and Assessment. When USEPA receives the State's letter of concurrence, it will be added to the Administrative Record.

ASSESSMENT OF THE SITE

The response actions selected in the ROD are necessary to protect the public health or welfare or the environment from the actual or threatened release of hazardous substances, pollutants, or contaminants into the environment.

DESCRIPTION OF THE SELECTED REMEDY

USEPA has identified the site's soil, residue, groundwater, surface water, and sediment as the media of concern for this remedy at the Eagle Zinc NPL site. This second operable unit presents the final response action for the site, and it addresses the principal threat at the site by consolidating, treating, and containing the RCRA hazardous waste materials and by consolidating and containing the main source of contamination- the residue materials.

The selected remedial actions for the OU2 site include:

- **Immobilization of Residue Piles which Exhibit the Characteristic of Leachability:** Residue piles which have the characteristic of leachability would be consolidated into one designated area and treated in-situ using immobilization agents. The piles would be covered with the IAC 807 cover;
- **Consolidation, Grading, and Cover of Residue Material Exceeding the Cleanup Level:** Residue and soil that exceed the cleanup levels would be consolidated, and covered with an IAC 807 complaint cover. The area to be covered would be about 22 acres;
- **Stream Re-alignment, Sediment Excavation, and Onsite Consolidation:** The westward flowing ephemeral stream would be realigned to reduce surface water interaction with the existing residue and to return the stream to its natural flow pattern. Sediment from the former stream bed would be excavated, as needed, and consolidated with the residue underneath the cover. Sediment from the ditch and stream located along the southern perimeter of the site, the two small onsite ponds, and the offsite tributary to the northeastern stream system would be excavated and disposed under the soil cover;
- **Institutional Controls:** A restrictive covenant was placed on the site in November, 2011. The covenant provides notice to future property owners that the residue and soil at the site poses risks to human health and the environment; restricts the use of groundwater and prevents disturbance of the remedy; and prohibits residential use of the property including homes, hospitals, and schools; and
- **Monitoring and Assessment:** Groundwater and surface water would be monitored, and the results evaluated and compared against the cleanup levels. An annual report will be prepared with the monitoring results, site inspection records, trend analysis, and recommendations for the site specific monitoring program.

The selected remedy will result in the excavation and containment of the contaminated material on site and is expected to prevent or abate actual or potential exposure to nearby human populations or animals from hazardous substances located on site either from direct contact or from potential releases. The selected remedy will also protect potential trespassers and others who access the property and potential future site workers, preventing direct exposure to site contaminant levels above the cleanup levels.

The selected remedy, Alternative 3, is expected to: prevent exposure to future industrial and construction workers to contaminants of concern (COCs) in the residue, soil, and groundwater; minimize leaching of COCs into the groundwater, minimize discharge of contaminated surface and groundwater into the site's water bodies; and prevent unacceptable risk to the aquatic receptors. The selected remedy is also expected to make 110 acres of the site available for industrial and commercial reuse.

STATUTORY DETERMINATIONS

The selected remedial actions are protective of human health and the environment, comply with Federal and State of Illinois requirements that are applicable or relevant and appropriate to the remedial actions, are cost-effective, and utilize permanent solutions and alternative treatment technologies to the maximum extent practicable.

The selected interim remedy satisfies the statutory preference for treatment as a principal element of the remedy. The residue piles which are characteristically hazardous will be treated with an immobilizing agent to prevent leaching of cadmium, lead, and zinc. Because this remedy will result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years of the remedial action to ensure that the interim remedy is, or will be, protective of human health and the environment.

A Proposed Plan for OU2 was released for public comment on May 30, 2012. It identified Alternative 3 as the Preferred Alternative for the site. USEPA reviewed all written and verbal comments submitted during the public comment period. It was determined that no significant changes to the remedy, as originally identified in the Proposed Plan, were necessary or appropriate.

ROD DATA CERTIFICATION CHECKLIST

USEPA has included the following information in the Decision Summary section of the Eagle Zinc OU2 site ROD. Additional information can be found in the Administrative Record for this site.

- Chemicals of concern (COCs) (See Section 8)
- Risk represented by the COCs. (See Section 8)
- Whether source materials constituting principal threats are found at the site (See Section 12).
- Cleanup levels established for the COCs and the basis for these levels. (See Section 9)
- Current and future land use assumptions used in the ROD (See Section 7).
- Estimated capital, annual operation and maintenance (O&M), and total present worth costs; discount rate; and the number of years over which the remedy cost estimates are projected (See Section 13).
- Key factor(s) that led to selecting the remedy (See Section 13).

Declaration for the Record of Decision
Eagle Zinc National Priorities List Site – Operable Unit 2
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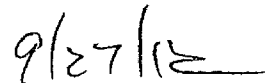
STATE CONCURRENCE

The State of Illinois concurs with the selected remedy.

AUTHORIZING SIGNATURE

A handwritten signature in black ink, appearing to read 'J. Kim', is written over a horizontal dashed line.

John J. Kim, Interim Director
Illinois Environmental Protection Agency

A handwritten date '9/27/12' is written in black ink over a horizontal dashed line.

Date